

*United States Attorney  
Southern District of New York*

November 25, 2019

Via ECF

The Honorable Paul A. Crotty  
United States District Judge  
Southern District of New York  
United State Courthouse  
500 Pearl Street, Courtroom 14C  
New York, New York 10007

**Re: *United States v. Joshua Adam Schulte*, S2 17 Cr. 548 (PAC)**

Dear Judge Crotty:

We write to provide notice of all of the Government’s classified filings in this case to date. The list attached as Exhibit A includes classified filings for which the Government has already provided notice on the public docket, such as the Government’s motion (the “Section 4 Motion”) pursuant to Section 4 of the Classified Information Procedures Act (“CIPA”).

Respectfully submitted,

GEOFFREY S. BERMAN  
United States Attorney

By: \_\_\_\_\_/s/

David W. Denton, Jr.  
Sidhardha Kamaraju  
Matthew Laroche  
Assistant United States Attorneys  
Tel.: 212-637-2744 / 6523 / 2420

Cc: Defense Counsel (via ECF)  
Daniel Hartenstine, Classified Information Security Officer (via Email)

**Exhibit A – Government’s Classified Filings**  
***United States v. Schulte*, S2 17 Cr. 548 (PAC)**

September 14, 2018:	Letter regarding a defense filing.
October 31, 2018:	<i>Ex parte</i> letter regarding the Government’s Section 4 Motion.
November 30, 2018:	Letter regarding the process by which classified information is being produced to the defendant.
December 10, 2018:	<i>Ex parte</i> Section 4 Motion.
February 8, 2019:	<i>Ex parte</i> letter regarding the Section 4 Motion and the February 5, 2019 <i>ex parte</i> conference.
February 12, 2019:	Letter regarding discovery issues related to the defendant’s personnel file and polygraph examinations.
February 20, 2019	<i>Ex parte</i> letter regarding the Section 4 Motion and the <i>ex parte</i> conference to be held on February 21, 2019.
March 26, 2019:	Letter regarding the Government’s responses to discovery issues raised by the defense.
April 2, 2019:	<i>Ex parte</i> letter regarding the Section 4 Motion and the <i>ex parte</i> conference held on March 14, 2019.
May 22, 2019:	<i>Ex parte</i> letter regarding the Section 4 Motion and the <i>ex parte</i> conference held on April 3, 2019.
July 1, 2019:	<i>Ex parte</i> letter regarding the Section 4 Motion and the <i>ex parte</i> conference held on May 23, 2019.
August 2, 2019:	Opposition to the defendant’s pretrial motions.
August 29, 2019:	Letter regarding the defendant’s request for additional information and documents related to the Section 4 Motion.
September 9, 2019:	Letter regarding the defendant’s requests for additional discovery related to his CIA workstation.
October 11, 2019:	Motion pursuant to CIPA Section 6(a) (the “Section 6(a) Motion”).
November 1, 2019:	Letter in response to the Court’s September 19, 2019 order directing the Government to reexamine the classification of certain FD-302s.
November 5, 2019:	Letter regarding the defendant’s request for additional information related to the Government’s expert disclosures.
November 22, 2019:	<i>Ex parte</i> letter at the Court’s request providing certain documents and information relating to the Section 6(a) Motion.